

1           A           I don't know. I was not involved in  
2 programming, - - -

3           Q           Okay.

4           A           - - - scheduling.

5           Q           Okay. Turning now to the third quarter of 1994,  
6 I'd like you to review the pages marked 20 and 21 and tell me  
7 whether or not those -- that narrative description appearing  
8 under Item 6 corresponds with your recollection of the  
9 programs you produced for the station during that time period.

10          A           (Witness reviewed document.)

11                      Yes.

12          Q           And do you see any errors appearing on those  
13 pages?

14          A           No, I don't.

15          Q           To your knowledge, were other broadcast stations  
16 in this area broadcasting anything similar in nature to what  
17 you produced for the station?

18          A           You mean radio?

19          Q           Radio or television.

20          A           I don't know. I live closer to Allentown and I  
21 really don't listen to the media in Reading.

22                      MR. HUTTON: Okay. I have nothing further.

23 Thank you.

24 BY MR. BECHTEL:

25          Q           If you could provide Mr. Schacht the exhibit and

1 -- and I want to go to that first entry, which was Page 5,  
2 three pages in, bottom of Page 5.

3 A Um-hum.

4 Q See that?

5 A Yeah.

6 Q Okay. Now, it reads, "WTVE post-produces and  
7 airs an ongoing three-minute feature entitled Elderly Update.  
8 The station takes stock footage from a newsfeed company and  
9 localizes the features with wraparound information about the  
10 following area seniors groups and organizations," and then  
11 seven of them are listed, and then it proceeds to provide  
12 descriptions of the installments.

13 Can you tell me how that post production worked?

14 A How their production aspect works?

15 Q How you produced that three-minute feature.

16 A All right. Well, let's take Berks County Office  
17 of Aging, for instance. I would take -- it would be defined  
18 by a time of the year. Tax time, let's say. And I would call  
19 the Berks County Aging people and I would find someone,  
20 usually a CPA, who had time to come and talk to us about the  
21 senior's filing their income tax. When to file them, what  
22 they need to file them, if they don't have the money they can  
23 go to the Department of Aging, they'll do it for no cost,  
24 where to get records if they need additional records for their  
25 income tax. The type of thing to help them to prepare to file

1 their income tax.

2 Q Well, then you're saying you produced the  
3 three-minute program. You didn't take a news feed and then  
4 put a wraparound for Berks County Office of the Aging, is that  
5 what you're saying?

6 A On that program I produced that program.

7 Q You said at the outset here that you produced 30  
8 minute programs.

9 A Yes. Early -- early on we were doing 30 minute  
10 programs. We were doing three -- three groups, three  
11 different programs in 30 minutes. And over the years that it  
12 -- it changed to doing -- here again, I'm working from memory.  
13 We changed to different time differentials, and whatever the  
14 time was that was allotted was the time that I produced the  
15 program for. I really don't remember all the time slots that  
16 were involved.

17 But Senior Update, Elderly Update was the last  
18 group that I produced. I found the people and made it -- made  
19 arrangements for them to come in and did the program. And it  
20 was done on a timely basis, a timely need basis for the  
21 community. Christmastime it was Christmas dinners and all of  
22 this thing. And we did home care on how seniors could get  
23 home care.

24 I don't know if you're aware or not, but the  
25 senior citizen is a very -- although they're growing, they're

1 very much an alone individual because they're afraid to get  
2 involved, they don't know where to go to get help. They're  
3 hesitant about calling people. And what we attempted to do  
4 was put out information to them so that they could go wherever  
5 they needed to get the help and get it because they do need  
6 help.

7 Q Yeah, I'm a senior citizen.

8 A So am I.

9 Q I know what you're - - -

10 A But, you know, unfortunately, a lot of them are  
11 not as fortunate as you and I.

12 Q Well, there is an assumption there about me but  
13 go ahead, we'll accept that.

14 A Beg your pardon?

15 Q There's an assumption there about me, but I'll  
16 accept that.

17 A Well, you're working and you're here and you  
18 look pretty healthy and you're quite capable of taking care of  
19 yourself, and a lot of them aren't, sir.

20 Q This is true. Go back to the 30 minute programs  
21 you did. Did you do those on Channel 51?

22 A Yeah.

23 Q And did you do those within the time frame 1989  
24 to 1994?

25 A 1989?

1 Q To 1994.

2 A It was in there somewhere, yeah. There was a  
3 different manager at the time who brought me in to do them.  
4 Jim Miller his name was, I think. I'm not sure about that.

5 Q I think there is a Miller.

6 MR. HUTTON: Jeff Miller?

7 THE WITNESS: Jeff Miller. That's where I  
8 started doing these programs, for him. And then the -- the  
9 type of program kept changing. It constantly was public  
10 affairs, public service, but the -- the structure of the thing  
11 changed several times throughout the years.

12 BY MR. BECHTEL:

13 Q Do you know Ms. Bradley?

14 A Yeah. Um-hum.

15 Q And you know Mr. Bendetti?

16 A Yes.

17 Q Now, you've indicated that the exhibit's  
18 descriptions in here are accurate?

19 A To my recollection.

20 Q All right. And if Ms. Bradley were to differ  
21 from your recall as to how these particular programs were  
22 produced, would you defer to her recollection?

23 MR. HUTTON: Objection. He has no basis for  
24 being able to answer that question.

25 BY MR. BECHTEL:

1 Q You can answer the question.

2 MR. HUTTON: I -- I object.

3 MR. BECHTEL: There's no harm -- there's no harm  
4 done that you can't erase down in Washington when we get the  
5 transcript. And that's the test.

6 MR. HUTTON: It's sheer speculation.

7 MR. BECHTEL: No. I'm going from her testimony.  
8 Her testimony was wraparound meant all they did was put the  
9 label on.

10 MR. HUTTON: You're asking him to recant his  
11 testimony.

12 MR. BECHTEL: I certainly am. It's inconsistent  
13 with the language of this exhibit as testified to by Ms.  
14 Bradley who prepared the exhibit and who was the sponsor of  
15 the exhibit.

16 MR. HUTTON: And this man did the program.

17 MR. BECHTEL: I understand that. And he didn't  
18 even think he was there until you got the exhibit out at the  
19 time.

20 MR. HUTTON: He's testified that it was  
21 accurate.

22 MR. BECHTEL: All right.

23 BY MR. BECHTEL:

24 Q Is it your testimony, sir, that when this  
25 exhibit says for each and every program that you've looked at,

1 "WTVE post-produces and airs an ongoing three-minute feature  
2 entitled Elderly Update. The station takes stock footage from  
3 a newsfeed company and localizes the features with wraparound  
4 information about the following area seniors groups and  
5 organizations," that that is an incorrect statement as to how  
6 that program was produced?

7 A No, I - - -

8 MR. HUTTON: I object to the question. The  
9 description about how the program is produced appears only in  
10 that one quarterly period, not in all -- not in the entire  
11 time period.

12 MR. BECHTEL: I stand corrected. Okay. That's  
13 Page 5, 6 and 7 from the first quarter of 1993. Now, let's go  
14 to the next one, and I will stand corrected.

15 Okay. The next one is the second quarter of  
16 1993, Page 11. It reads: "WTVE-TV51 post-produces and airs  
17 an ongoing three-minute Public Service segment entitled  
18 'Elderly Update.' The station takes stock footage from a  
19 newsfeed company and localizes the features with wraparound  
20 information about the following area seniors groups and  
21 organizations."

22 MR. HUTTON: Okay. You have corrected me on  
23 that one.

24 MR. BECHTEL: Okay. I'll refer you to the next  
25 one.

1 MR. HUTTON: Okay.

2 MR. BECHTEL: It's the same language. This is  
3 the third quarter of 1993.

4 MR. HUTTON: All right. I withdraw that  
5 objection.

6 MR. BECHTEL: What was my question?

7 (Whereupon, the Reporter read back the  
8 referred-to testimony.)

9 THE WITNESS: What is it you want an answer to?  
10 I don't know what -- what Ms. Bradley did. I know that when  
11 it comes to -- I did programs on Berks County Aging. I did  
12 programs on Kutztown Senior Center, Berks County Senior  
13 Citizens Council, Temple Association of Retired Professionals,  
14 and others. I did -- I did programs for those people. They  
15 came in and I did programs with them. What Ms. Bradley did, I  
16 don't know. I wasn't there. I was in that studio probably an  
17 hour and a half a month. I don't know what she did.

18 MR. BECHTEL: Okay. Thank you. That satisfies  
19 me.

20 A Okay.

21 MR. BECHTEL: Let me see if I have any other  
22 questions. I don't think I do.

23 (Brief pause.)

24 MR. BECHTEL: That will get it. Thank you.

25 THE WITNESS: You're quite all right.



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MR. HUTTON: Thank you very much.

THE WITNESS: Okay.

(Whereupon, the deposition concluded at 10:30  
o'clock a.m.)

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I have reviewed my deposition and it is true and correct except for any corrections noted on the attached Errata Sheet, which I have also signed.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Ray M. Schacht

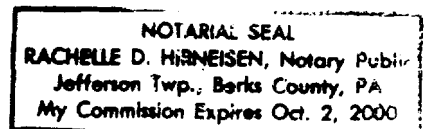
I, Rachelle D. Hirneisen, the officer before whom the deposition of RAY M. SCHACHT was taken, do hereby certify that RAY M. SCHACHT, the witness whose testimony appears in the foregoing deposition, was duly sworn by me on October 21, 1999, and that the transcribed deposition of said witness is a true record of the testimony given by him; that the proceedings are herein recorded fully and accurately to the best of my ability; that I am neither attorney nor counsel for, nor related to any of the parties to the action in which this deposition was taken; and, further, that I am not a relative of any attorney or counsel employed by the parties hereto or financially interested in this action.

Rachelle D. Hirneisen, RMR

Notary Public in and for  
the Commonwealth of Pennsylvania

My Commission expires October 2, 2000

BERKS COURT REPORTING SERVICE



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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

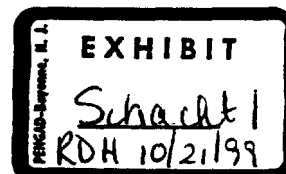
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In re Applications of ) MM Docket No. 99-153  
READING BROADCASTING, INC. ) File No. BRCT-940407KF  
For Renewal of License of )  
Station WTVE(TV), Channel 51 )  
Reading, Pennsylvania )  
and )  
ADAMS COMMUNICATIONS CORPORATION ) File No. BPCT-940630KG  
For Construction Permit for a New )  
Television Station to Operate on )  
Channel 51, Reading, Pennsylvania )

To: Magalie Roman Salas, Secretary  
for direction to  
The Honorable Richard L. Sippel  
Administrative Law Judge

NOTICE BY ADAMS OF DEPOSITION  
UPON ORAL EXAMINATION

Adams Communications Corporation ("Adams") gives notice of its intent to take the deposition of Ray Schacht, a/k/a Carl Stewart, 31 Pine Street, Breiningsville, PA 18031, upon oral examination on Thursday, October 21, 1999, commencing at 10 a.m. at the Comfort Inn, 2200 Stacy Drive, Reading, PA. We anticipate the deposition will be concluded within one hour. This is one of several depositions being taken during the period Wednesday, October 20, 1999, through Saturday, October 23, 1999. If the date and time cannot be accommodated, please contact Simone Parrish at 202-833-4190 collect, who will make an effort to revise the schedule to accommodate you. The subject of the deposition is your knowledge of programming and operations of station WTVE, channel 51, during the period August 1, 1989



through July 31, 1994. The deposition will be taken before a court reporter.

Respectfully submitted,

Gene A. Bechtel / sP  
Gene A. Bechtel  
Harry F. Cole

Bechtel & Cole, Chartered  
Suite 250, 1901 L Street, N.W.  
Washington, D.C. 20036  
Telephone 202-833-4190  
Telecopier 202-833-3084

Counsel for Adams Communications  
Corporation

September 28, 1999

CERTIFICATE OF SERVICE

I certify that I have this 28th day of September 1999 caused copies of the foregoing NOTICE BY ADAMS OF DEPOSITION UPON ORAL EXAMINATION to be hand delivered to the offices of the following:

The Hon. Richard L. Sippel  
Administrative Law Judge  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

James Shook, Esq.  
Mass Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Thomas J. Hutton, Esq.  
Holland & Knight, L.L.P.  
Suite 200, 2000 K Street, N.W.  
Washington, D.C. 20006  
Counsel for Reading Broadcasting, Inc.

A handwritten signature in black ink, appearing to read "Simone Parrish", is written over a horizontal line.

Simone Parrish  
Legal Assistant

**SUBPOENA**

**ORIGINAL - To be executed by the person who effects service and returned to the Secretary of the Commission.**

UNITED STATES OF AMERICA

FEDERAL COMMUNICATIONS COMMISSION

IN THE MATTER OF  
READING BROADCASTING, INC.

For Renewal of License for  
Station WTVE(TV), Channel 51,  
Reading, Pennsylvania

MM Docket No. 99-153

THE PRESIDENT OF THE UNITED STATES OF AMERICA

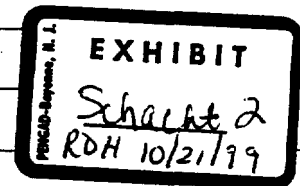
To Ray Schacht, a/k/a Carl Stewart, 31 Pine Street, GREETINGS:  
Breinigsville, PA 18031

YOU ARE HEREBY ORDERED under penalty of law to appear before the Federal Communications Commission or

any duly authorized notary public at the Comfort Inn, 2200 Stacy Drive  
(Name and official title of person authorized to take depositions)

in the city of Reading, PA on the 21st day of October, 19 99,  
at 10 o'clock A. M., of that day, to testify in the above-captioned matter and to bring with you and to  
produce then and there the following books, papers, and documents: See attached

READING EXHIBIT 30  
PAGE 25



BY ORDER OF THE FEDERAL COMMUNICATIONS COMMISSION, this twenty-eighth day of  
September, 19 99.  
Richard L. Hirsch  
(Official Title)  
Administrative Law Judge

NOTICE: - Witness fees and mileage for attendance under this subpoena for service hereof are to be paid by the party at whose instance the witness is subpoenaed, and every copy of this summons for the witness must contain a copy of this notice.

Service of subpoenas may be made by any citizen of the United States over the age of 18 years who is competent to be a witness, and is not a party to or in any way interested in the proceeding.

PROOF OF SERVICE ON REVERSE SIDE.

Attachment 1:  
DOCUMENTS TO BE PRODUCED

All documents of any kind or description relating to the deponent's knowledge of or familiarity with the operations, including the programming, of Station WTVE(TV), Reading, Pennsylvania, during the period August 1, 1989 through July 31, 1994.



October 21, 1999

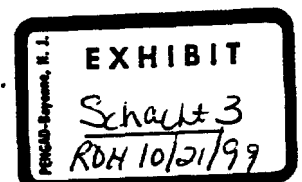
PROGRAMS/ISSUES REPORTS

3RD QUARTER 1989 - 3RD QUARTER 1994

WTVE-51  
READING, PA

RAY SHACHT a/k/a CARL STEWART

ELDERLY UPDATE



"Credit Cards" .....AFFIDAVIT "18"

More than six thousand financial institutions offer bank cards. And the chance that if consumers really took the time to look for a card that suits their needs, they could save over \$700.00 per year. Peter Hackes reports on what to look for when considering various credit card offers. Segment also slates upcoming activities for local seniors.

"Longevity" .....AFFIDAVIT "19"

While there are many unanswered questions about how we age, most experts agree that regular exercise and a healthy diet will add years to one's life.

"Childhood Memories" .....AFFIDAVIT "20"

Peter Hackes talks with a retired government engineer who wrote a book about his childhood experiences.

"Youth Help Elderly" .....AFFIDAVIT "21"

High school and law enforcement officials in South Florida have devised a way to keep teens off the street, while at the same time fighting crime against the elderly. Peter Hackes takes a closer look at this innovative inner-city program that is bringing generations together.

"Sex Over Sixty" .....AFFIDAVIT "22"

Dr. Robert Butler and Myrna Lewis, co-authors of a new book "Love & Sex After Sixty", dispell myths that a couple's love-life slows down after a certain age. They point to recent studies showing that couples who have sex after sixty lead happier, healthier and more well-adjusted lives.

"Scams" .....AFFIDAVIT "23"

Researchers from Eastern Michigan alert consumers, particularly seniors, about numerous mail fraud and contest scams that make bilk people out of millions each year, in the disguise of legitimate contests, offers and the such. Interviewed are people who have overcome the scams, with tips on what to watch out for.

"Wee Deliver" .....AFFIDAVIT "24"

There's a new first-class letter carrying service sweeping the nation's elementary schools. The U.S. Postal Services "Wee Deliver" program helps overcome illiteracy, while teaching children about job responsibilities. Retired postal workers visit schools and put children to work in the classroom, either as letter carriers or clerks.

"House Fraud" .....AFFIDAVIT "25"

Sometimes elderly people are targeted by con artists who attempt to determine the value of their homes for whatever unscrupulous purpose. One scam involves

con artists who pose as home remodelers. They convince elderly homeowners to put up the value of their houses as collateral for home improvement work. If the homeowners fail to pay, they are told that they will be foreclosed on or evicted.

"Understanding Long Term Care Insurance" .....AFFIDAVIT "26"

This segment, 4 1/2 minutes in length, provides information pertinent to the many Americans who presently need or will need health care at home or in nursing facilities. The feature explores various options and offers tips and pointers in an unbiased way. Sponsored by ACSIA Insurance Services.

The following P.S.A.'s pertaining to issues of the elderly aired on WTVE in the First Quarter of 1993:

"Alzheimers Disease" .....AFFIDAVIT "27"

The American Health Assistance Foundation sponsors this 30-second P.S.A. in conjunction with the Independent Telephone Pioneer Association. Elderly citizens and concerned family members are given ways to find out more information about the disease.

"George Burns" .....AFFIDAVIT "28"

his 30-second P.S.A., sponsored by the National Institute of Health in conjunction with the U.S. Department of Health and Human Services, features George Burns and Bobby Vinton giving their advice on aging in a humorous light. The spot also gives more information about how to obtain free tapes on aging.

## 7). ISSUE: CONCERNS OF THE ENVIRONMENT

"Trout Unlimited" (I).....AFFIDAVIT "29"

WTVE works closely with the Pennsylvania Council of Trout Unlimited, out of Harrisburg, and the local Tulpehocken Chapter to promote preservation of cold-water resources. The first P.S.A., 30-seconds in length, identifies what constitutes a cold-water resource and the need to protect it.

"Trout Unlimited" (II).....AFFIDAVIT "30"

Another in a series of P.S.A.'s from the Pennsylvania Council of Trout Unlimited, this spot talks about what is being done to clean up our natural resources.

"Trout Unlimited" (III).....AFFIDAVIT "31"

This 60-second P.S.A. from the Pennsylvania Council of Trout Unlimited features former President Jimmy Carter casting for trout. He talks about what pollutes streams and how it kills stream life. He urges all Americans to get involved in saving our natural resources.



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: EDERLY REPORT #9 "HOUSE FRAUD" Length: 3:00

3/1/93

09:18:37A

06:23:57P

3/2/93

09:22:30A

03:19:31P

06:19:48P

3/3/93

10:22:33A

04:13:55P

10:22:46P

3/4/93

10:22:00A

04:14:44P

0:21:15P

3/5/93

09:18:53A

07:18:25P

3/7/93

04:20:55P

3/8/93

09:24:35A

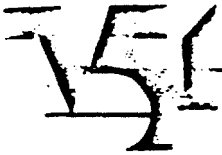
07:23:00P

3/9/93

09:22:41A

07:21:36P

READING EXHIBIT 30  
PAGE 30



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: UNDERSTANDING LONG TERM CARE INSUR. Length: 4:30

02/27/93

10:51:05A-10:55:35A

AFFIDAVIT "26"

READING EXHIBIT 30  
PAGE 31



**WTVE • Reading Broadcasting, Inc.**

This is to certify that WTVE-TV51 aired the following Public Service announcement at the below dates and times:

Title: EDERLY REPORT #6 "SEX AFTER 60" Length: 3:00

1/30/93

06:21:30A

10:58:56A

04:20:17P

1/31/93

06:21:30A

06:20:30P

AFFIDAVIT "22"

**READING EXHIBIT 30  
PAGE 32**



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: EDERLY REPORT #6 "SEX AFTER 60" Length: 3:00

2/1/93

04:21:25A

07:19:18A

09:57:00A

2/2/93

04:21:28A

07:22:51A

05:22:51P

2/3/93

06:22:15A

06:22:05P

2/4/93

06:22:26A

06:23:05P

/5/93

05:22:35A

12:20:05P

06:23:20P

2/7/93

08:26:40A

2/8/93

05:21:38A

12:21:59P

06:20:40P

READING EXHIBIT 30  
PAGE 33



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: HEALTH REPORT #7 "SCAMS" Length: 3:00

2/12/93

02:22:40P

2/13/93

02:22:12P

11:23:40P

2/14/93

02:17:00P

11:21:30P

2/15/93

02:19:05P

2/16/93

03:22:00P

04:19:40P

11:22:30P

2/17/93

12:22:10P

11:21:54P

2/18/93

00:20:53A

01:18:15P

05:18:49P

AFFIDAVIT "23"

READING EXHIBIT 30  
PAGE 34





**WTVE • Reading Broadcasting, Inc.**

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: EDERLY REPORT #8 "WEE DELIVER" Length: 3:00

2/19/93

08:22:38A

01:21:41P

05:22:40P

2/20/93

12:22:33P

05:22:35P

2/21/93

12:22:36P

05:17:50P

2/22/93

08:19:27A

01:21:50P

2/23/93

01:21:42P

05:17:00P

2/24/93

06:22:39A

10:23:06A

02:22:28P

2/25/93

06:22:09A

10:19:41A

05:17:57P

2/26/93

09:22:35A

03:22:45P

06:23:41P

AFFIDAVIT "24"

**READING EXHIBIT 30  
PAGE 35**